

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar No. 14853
5 PATRICK A. ROSE
6 Assistant United States Attorney
7 Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Patrick.Rose@usdoj.gov
Attorneys for the United States

8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF NEVADA**

10 In re:
11 Jelmer Hoekstra and Yazmin Hoekstra
12 Debtors,

Case No. 2:18-bk-16157-gs
Chapter 7

13
14 Mia Hoekstra (formerly known as Yazmin
Hoekstra

Adversary Case No. 2:20-ap-01094-gs

15 Plaintiff,

Joint Status Report

16 v.

17 United States Department of Education and
18 Nelnet,

19 Defendants.

20
21 Pursuant to directions of the Court at the January 27, 2022, status hearing, Plaintiff
22 Mia Hoekstra (formerly known as Yazmin Hoekstra) and Defendant United States
23 Department of Education, provide this status and scheduling report. Without waiver or
24 admission of the parties, they advise generally that this is an adversary proceeding for a
25 discharge of student loan debt, largely based on the health condition of Plaintiff's minor son,
26 Arjan.

27 Pursuant to subpoenas and/or HIPAA releases, Defendant collected medical records
28 from several providers for Arjan. Some providers were in Nevada, and some were out of

1 state. Defendant is in the process of following up with some providers as to outstanding
 2 records, as well as seeking updates from several of the providers.

3 In the Fall of 2021, Plaintiff and her family moved from Las Vegas, Nevada to
 4 Aurora, Colorado. Defendant has requested Plaintiff to supplement her discovery responses
 5 to identify any health and home care providers for Arjan in Colorado and provide any new
 6 HIPAAs as may be needed. Upon receipt of such information, Defendant will collect records
 7 from such providers in Colorado.

8 The parties have scheduled the depositions (via video conference) of Plaintiff and her
 9 husband, Jelmer Hoekstra, (Arjan's parents) for April 5 and 6, 2022.

10 Upon receipt and review of the additional health records mentioned above,
 11 Defendant will be in a position to decide which, if any, depositions of health care providers
 12 to schedule.

13 The parties estimate completing discovery by June 30, 2022.

14 The parties request a status conference in July 2022 to schedule, as then applicable,
 15 dates for filing and hearing dispositive motions, a settlement conference, and/or trial.

16 Respectfully submitted this 8th day of February 2022.

17 FREEDOM LAW FIRM, LLC 18 <u>/s/ George Haines</u> GEORGE HAINES, ESQ. 19 Nevada Bar No. 9411 20 8985 South Eastern Avenue, Suite 350 21 Las Vegas, NV 89123 <i>Attorney for Plaintiff</i>	17 CHRISTOPHER CHIOU Acting United States Attorney 18 <u>/s/ Patrick A. Rose</u> PATRICK ROSE Assistant United States Attorney <i>Attorneys for the United States</i>
--	--